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Filing date: **11/23/2020**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91252817
Party	Plaintiff House of Kuipers, LLC
Correspondence Address	DANIEL M CISLO AND DAVID B SANDELANDS CISLO & THOMAS LLP 12100 WILSHIRE BLVD STE 1700 LOS ANGELES, CA 90025 UNITED STATES Primary Email: ttab@cislo.com Secondary Email(s): David@cislo.com, ksylvester@cislo.com 310-979-9190
Submission	Motion to Amend Pleading/Amended Pleading
Filer's Name	Katherine Bond
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Signature	/Katherine Bond/
Date	11/23/2020
Attachments	20201123 P Mtn. for Leave to Amend Notice of Opp and amended Opp FINA L.pdf(172682 bytes) Notice of Opposition Amended REDLINE w ExHIBIT A.pdf(2352911 bytes) Amended Notice of Opp. w Exhibit A CLEAN VERSION.pdf(6226724 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

HOUSE OF KUIPERS LLC, <i>et al.</i> ,	Trademark: ZOX
Opposer,	Application No.: 88/228,839
-against-	Opposition No.: 91252817
JOHN ZOX, an individual	
Applicant.	

MOTION FOR LEAVE TO FILE AN AMENDED NOTICE OF OPPOSITION

Pursuant to Federal Rule of Civil Procedure 15(a)(2) and Trademark Rule § 2.107 Opposer/Counterclaim Defendant House of Kuipers, LLC *et al.* (“Opposer”) respectfully brings this motion seeking leave to amend its Notice of Opposition of Application Serial No. 88/228,839 (the “‘839 Application”) filed by Applicant/Counterclaim Plaintiff, John Zox (“Applicant”) for the standard character word mark “ZOX”, in order to clarify the facts concerning Opposer’s asserted fraud claim specifically, that Applicant had no *bona fide* use of the applied-for ZOX mark in commerce in connection with the goods identified in the use-based ‘839 Application, at the time the ‘839 Application was filed.

For the reasons set forth below, Applicant requests that the Board grant this motion. A clean and redlined copy of the proposed Amended Notice of Opposition is attached hereto.

PROCEDURAL BACKGROUND

Opposer filed its Notice of Opposition (“Notice”) on December 10, 2019, opposing registration of the term “ZOX” for use in connection with all of the applied-for goods. The

Notice asserted three claims: (1) priority and likelihood of confusion, (2) dilution by blurring, and (3) fraud on the USPTO.

Applicant served his Answer and Counterclaim on March 19, 2020. The Counterclaim petitions to cancel Registration No. 4,465,691 for ZOX, Registration No. 4,759,961 for ZOXBOX, and Registration No. 5,233,845 for ZOX.

Opposer filed its Answer to the Counterclaim on May 22, 2020.

On June 17, 2020, Opposer filed a Notice of Change in ownership as to some of the registrations at issue in this matter.

Applicant filed an Opposition to the Notice in Change in Ownership on September 23, 2020 asserting the new owner of Opposer's registrations should be joined as a party and not substituted.

The proceeding is presently suspended pending the resolution of the motion to substitute.

LEGAL STANDARD

When determining whether to permit a party to amend its pleading, the Board "freely give[s] leave [to amend] when justice so requires." See 37 C.F.R. § 2.107 and 37 C.F.R. § 2.115; Fed. R. Civ. P. 15(a)(2). Consequently, "the Board liberally grants leave to amend pleadings at any stage of a proceeding when justice so requires, unless entry of the proposed amendment would violate settled law or be prejudicial to the rights of the adverse party or parties." *Boral Ltd. v. FMC Corp.*, 59 U.S.P.Q.2d 1701, 1702 (T.T.A.B. 2000). Therefore, the Board must consider whether there is any undue prejudice to the nonmoving party and whether the amendment is legally sufficient. See *Foman v. Davis*, 371 U.S. 178, 182 (1962); *Am. Optical Corp. v. Am. Olean Tile Co., Inc.*, 168 USPQ 471, 473 (TTAB 1971).

ARGUMENT

A. The proposed amendment is consistent with settled law.

Opposer's proposed amended Notice is consistent with settled law. A legally sufficient pleading of fraud requires allegations that Applicant knowingly made specific, false representations of material fact in connection with its application with the intent of obtaining (or maintaining) a registration to which it is otherwise not entitled. See *In re Bose Corp.*, 580 F.3d 1240, 91 USPQ2d 1938, 1942 (Fed. Cir. 2009). The proposed amendments to Opposer's Notice only clarifies and supports the already asserted claim of fraud. Upon information and belief, Applicant did not make a bona fide use of the applied-for ZOX mark in U.S. commerce in connection with the identified goods at the time the '839 Application was filed. If true, the subject application is *void ab initio*, pursuant to 15 U.S.C. § 1051(a), and the application should be refused accordingly. Since filing the Notice, Opposer discovered most of the specimens provided to the Trademark Office were generated using "custom print" online services. With this motion, Opposer has provided "replicated" specimens using the generic letters "XYZ" and a circle design to demonstrate how some of the specimens were generated for the '839 Application. See **Exhibit A**. Images of memorabilia is also not use in commerce as required by Section 45 of the Trademark Act, 15 U.S.C. §1127. This is the exact type of behavior the Trademark Office's special task force (Specimen Protest Pilot Program), is attempting to stop; "...the most common suspicious specimen types were digitally altered images and labels being added to generic items". Early discovery has confirmed this position in that no documents have been produced showing even a single sale for one of the listed goods.

B. The proposed amended Notice will not prejudice Applicant.

The second factor the Board considers in granting a motion such as this is whether or not the proposed amendment would prejudice the nonmoving party. In determining whether the other party would be prejudiced by allowance of the proposed amendment, the timing of the motion for leave to amend plays a large role. *Black & Decker Corp. v. Emerson Electric Co.*, 84 USPQ2d 1482, 1486 (TTAB 2007). There are three main reasons why Applicant will not suffer any prejudice if this motion is granted. First, as stated above, this opposition proceeding is presently suspended and discovery is still ongoing. Opposer has served a first set of discovery on Applicant but Applicant has not propounded any discovery. Neither party has conducted any depositions. Thus, Opposer will not be prejudiced as it will have the full and complete opportunity to investigate and conduct discovery on Opposer's amended contentions. In fact, the Board has allowed amendments to pleadings at much later stages than that requested by Opposer. *Focus 21 Int'l Inc. v. Pola Kasei Kogyo Kabushiki Kaisha*, 22 USPQ2d 1316, 1318 (TTAB 1992)(motion to amend filed prior to opening of petitioner's testimony period permitted). Second, Opposer is not expanding the scope of its claims but simply clarifying an existing claim that Applicant, failed to disclose facts to the Patent and Trademark Office, to procure a registration to which he was not entitled. Applicant will not suffer prejudice from allowing Opposer's additional facts because Applicant does not require discovery on his own alleged use of the mark or, lack thereof. Finally, in the past couple months, Applicant has continued to use the subject application against Opposer by filing two additional Oppositions, Nos. 91265525 and 91265309.

CONCLUSION

For the reasons set forth above, Opposer respectfully requests that the Board grant this

Motion for Leave to Amend its Notice of Opposition to provide additional support for its fraud claim.

Respectively submitted,

House of Kuipers LLC, et al.

Dated: November 23, 2020

By: /Katherine Bond/

Katherine M. Bond, Esq.
Daniel M. Cislo, Esq.
David B. Sandelands, Esq.
12100 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90025
Tel: 310.979.9190
Its Attorneys

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing OPPOSER'S MOTION FOR LEAVE TO FILE AN AMENDED NOTICE OF OPPOSITION and the AMENDED NOTICE OF OPPOSITION was served on opposing counsel via email this 23rd day of November 2020.

Counsel for Applicant:
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ehuang@lgtrademark.com

/Katherine Bond/

Katherine M. Bond

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

IN THE MATTER OF TRADEMARK SERIAL NO. 88/228,839

House of Kuipers LLC, a California limited liability company, et al.,)	
)	
)	
Opposer,)	
)	
v.)	
)	
John Zox, an Individual,)	
)	
Applicant.)	
)	

Opposition No.: 91252817

AMENDED NOTICE OF OPPOSITION

Opposer House of Kuipers, LLC, a California Limited Liability Company, having offices at 5304 Derry Avenue, Suite G, Agoura Hills, CA 91301, and its related entity ZOX LLC, a California Limited Liability Company, having offices at 5304 Derry Avenue Suite J, Agoura Hills, CA 91301 (collectively, “House of Kuipers”), believes that it will be damaged by the registration of the trademark shown in Application Serial No. 88/228,839 (the “Application”) filed by ZOX Music and later assigned to John ZOX an individual with address at PO Box 3236 Church Street, New York, New York 100083236 (collectively, “John Zox”). House of Kuipers therefore opposes the Application and requests that registration of the Application be refused.

As grounds for its opposition, House of Kuipers alleges that:

1. John Zox seeks to register a mark that consists of the term ZOX (“Applicant’s Mark”) for use in connection with “Non-magnetically encoded gift cards; Stickers and transfers” (Applicant’s Class 16 Application), “non-metal identification bracelets” (Applicant’s Class 20

Application), “all-purpose straps comprised of synthetic materials; Sacks or bags for the transportation or storage of materials in bulk; String” (Applicant’s Class 22 Application), “fabrics for textile use” (Applicant’s Class 24 Application), and “Arm bands; Belt buckles; Charms for shoes; Clothing accessories, namely, charms for attachment to zipper pulls and buttons; Hair bands; Shoe laces” (Applicant’s Class 26 Application) in International Classes 16, 20, 22, 24, and 26 (collectively, the “Applicant’s Goods”) John ZOX filed the Application on December 13, 2018.

2. This Notice of Opposition is timely filed within the time permitted following publication of the application in the Official Gazette.

3. Applicant’s registration should be denied in connection with Applicant’s Goods because Applicant’s ZOX mark is primarily merely a surname. Furthermore, Applicant has not provided and cannot show substantial, exclusive and continuous use of the mark in commerce in connection with Applicant’s Goods for at least the five years immediately before the date of his application for registration.

4. The Applicant’s Application should be refused in connection with Applicant’s Goods because Applicant’s use of the term “ZOX” does not function as a trademark. As further described below, Applicant’s specimens filed in connection with the Application show merely ornamental use of the term “ZOX.” A purchaser of the goods would not understand that the term “ZOX” on the Applicant’s Goods is intended to identify the applicant as the source of the goods, but rather would see it only an ornamentation on the goods.

5. The Applicant’s Application should be refused because registration is being sought fraudulently in violation of 15 U.S.C. § 1064(3). As House of Kuipers’ has grown more famous, so have the claims of Applicant that it also now sells the same goods or goods in close

proximity to House of Kuipers Goods in interstate commerce. Since as early as 2014, Applicant has sought to register trademarks that infringe upon and dilute the House of Kuipers' Trademarks (See Serial No. 86954997) on the basis that because Applicant's last name is ZOX and Applicant's late musical band was called "ZOX," it should be entitled to the ZOX trademark across a wide variety of goods. Applicant's musical band, ZOX, has not toured since 2014, and Applicant's specimens do not show goods that have actually been produced, rather provide mockups of goods that Applicant may produce and sell. For example, a consumer can use the online custom print platform such as Zazzle to upload an image and/or name. Attached as Exhibit A are "replications" using "XYZ" in a circle design of some of the alleged specimens Applicant filed in connection with the Application. Upon information and belief, Applicant did not make a *bona fide* use of the applied-for ZOX mark in U.S. commerce in connection with the identified goods at the time the Application was filed. If true, the subject application is *void ab initio*, pursuant to 15 U.S.C. § 1051(a), and the application should be refused accordingly.

House of Kuipers has reason to believe that Applicant has not sold any or most of the goods claimed by Applicant in interstate commerce at any point or at least not for five years prior to this Application. Applicant's Application contains the statements that "[t]he applicant...is using the mark in commerce," and that "the mark was first used at least as early as the dates listed in the table below and first used in commerce at least as early as the dates listed in the table below."

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<u>Class</u>	<u>Goods</u>	<u>First Use In Commerce</u>
<u>16</u>	<u>Non-magnetically encoded gift cards; Stickers and transfers.</u>	<u>20040901</u>
<u>20</u>	<u>Non-metal identification bracelets</u>	<u>20050601</u>
<u>22</u>	<u>All-purpose straps</u>	<u>20050601</u>

	<u>comprised of synthetic textile materials; Sacks or bags for the transportation or storage of materials in bulk; String.</u>	
<u>24</u>	<u>Fabrics for textile use</u>	<u>20070101</u>
<u>26</u>	<u>Arm bands; Belt buckles; Charms for shoes; Clothing accessories, namely, charms for attachment to zipper pulls and buttons; Hair bands; Shoe laces.</u>	<u>20050601</u>
<u>28</u>	<u>Party games</u>	<u>20070101</u>

The Application also contains a standard declaration as to the truth of Applicant's statements in the Application.

6. Alternatively, Applicant's Application should be refused because registration is being sought for a mark that has been abandoned by Applicant. Any registration would be in violation of 15 U.S.C. § 1064(3).

7. Since at least as early as 1991, House of Kuipers, its predecessors, its assignors, its related companies, or its licensees have continuously used the term ZOX, alone or with another term for a wide variety of retail products and services, including ZOX, ZOXBOX, ZOX STRAPS, and ZOXLIST ("House of Kuipers' Trademarks") in connection with the sale of retail and wholesale products including wristbands, clasp bracelets, hoodies, hoodie strings, dog bags, backpacks, camera bags, small bags, interchangeable bag straps, shirts, wall prints, keychains, lanyards, coloring books, stickers, electronic gift cards and radio frequency identification bracelets, and in close proximity to clothing, accessories and identification bracelets, and paper products ("House of Kuipers' Goods"), the products being sold under the name ZOX and now

appearing in connection with House of Kuipers' related trademarks and goods on the zox.la product pages.

8. Since at least as early as 1991, ZOX International, Inc., a Nebraska Corporation, continuously used the term ZOX, Registration No. 2,992,108 in interstate commerce as an identifier of a variety of goods and services, including clothing and accessories; namely, jackets, coats, sweaters, pants, shirts, shorts, swimwear, and undergarments for women and men, jogging suits, T-shirts, tank tops, jerseys, cotton woven shirts, knit shirts, polo shirts, golf shirts, dresses, blouses, nightgowns, pajamas, sweat pants, sweatshirts, jogging suits, neckties, belts, suspenders, sandals, shoes, caps, hats, wristbands, head bands, sun visors, scarves, bandannas, ear muffs, gloves, mittens, leg warmers, pantyhose, stockings, leotards, tights, and leggings in International Class 25. This trademark was registered on the Principal Register on September 6, 2005 from an application filed on May 10, 2004. House of Kuipers was assigned the rights and goodwill associated with Registration No. 2,992,108 on April 25, 2013.

9. Since at least as early as 2011, House of Kuipers, its predecessors, its related companies, or its licensees have continuously used the term ZOX Straps, Registration No. 4,412,948 in interstate commerce as an identifier of a variety of goods and services, including Elastic fabric wristbands in the nature of a bracelet in International Class 14. This trademark was registered on the Principal Register on October 8, 2013 from an application filed on October 3, 2011.

10. Since at least as early as 2011, House of Kuipers, its predecessors, its related companies, or its licensees have continuously used the term ZOX, Registration No. 4,465,691 in interstate commerce as an identifier of a variety of goods and services, including Wristbands in the nature of a bracelet in International Class 14 and Wristbands; shirts in International Class

025. This trademark was registered on the Principal Register on January 14, 2014 from an application filed on May 31, 2013.

11. Since at least as early as 2012, House of Kuipers, its predecessors, its related companies, or its licensees have continuously used the term ZOXBBOX, Registration No 4,759,961 in interstate commerce as an identifier of a variety of goods and services, including Wristbands in International Class 025. This trademark was registered on the Principal Register on June 23, 2015 from an application filed on November 2, 2014.

12. Since at least as early as 2011, House of Kuipers, its predecessors, its related companies, or its licensees have continuously used the term ZOX, Registration No 5,233,845 in interstate commerce as an identifier of a variety of goods and services, including Backpacks in International Class 018 and On-line retail and wholesale store services featuring clothing apparel, wristbands, bags and accessories in International Class 035. This trademark was registered on the Principal Register on June 27, 2017 from an application filed on July 7, 2016.

13. House of Kuipers' Trademarks have also continuously appeared in substantial advertising and promotion of House of Kuipers' Goods, such that the marks are closely identified with House of Kuipers' Goods and have gained valuable public recognition. House of Kuipers has substantial and continuous sales and advertising in all fifty United States for House of Kuipers Goods'. House of Kuipers' Trademarks are inherently distinctive or have become distinctive through acquisition of secondary meaning. By virtue of its sales of high-quality products bearing House of Kuipers' Trademarks in interstate commerce, its expenditures of considerable sums for promotional activities, and the excellence of its products, House of Kuipers developed significant goodwill in House of Kuipers' Trademarks and a valuable reputation.

14. House of Kuipers has continuously used House of Kuipers' Trademarks in interstate commerce for retail products and services related to House of Kuipers' Goods, and in close proximity to products, including wristbands, clothing accessories, radio frequency identification bracelets, gift cards, stickers, and interchangeable strings for bags all of which directly overlap with Applicant's Goods since prior to any date upon which John Zox can rely.

15. Applicant's Class 20 Application for "non-metal identification bracelets," directly overlap or are in close proximity to House of Kuipers' Goods, including wristbands, bracelets, backpacks, clothing and accessories (Registration Nos. 2,992,108, 4,412,948, 4,465,691 and 5,233,845).

16. Applicant's Class 22 Application for "fabrics for textile use" directly overlaps with or are in close proximity to House of Kuipers' Goods, including wristbands, bracelets, backpacks, clothing and accessories (Registration Nos. 2,992,108, 4,412,948, 4,465,691 and 5,233,845).

17. Applicant's Class 24 "Arm bands; Belt buckles; Charms for shoes; Clothing accessories, namely, charms for attachment to zipper pulls and buttons; Hair bands; Shoe laces" directly overlap or are in close proximity to House of Kuipers' Goods, including wristbands, bracelets, backpacks, clothing and accessories (Registration Nos. 2,992,108, 4,412,948, 4,465,691 and 5,233,845).

18. Applicant's Class 26 Application for "all-purpose straps comprised of synthetic materials; Sacks or bags for the transportation or storage of materials in bulk; String" directly overlap or are in close proximity to House of Kuipers' Goods, including wristbands, bracelets, backpacks, clothing and accessories (Registration Nos. 2,992,108, 4,412,948, 4,465,691 and 5,233,845).

19. House of Kuipers' Trademarks are distinctive, strong, and famous such that the public would associate House of Kuipers' Trademarks with House of Kuipers when encountering House of Kuipers' Trademarks apart from House of Kuipers' Goods.

20. Applicant's Mark so resembles House of Kuipers' Trademarks, as to be likely to cause confusion, or cause mistake, or to deceive, in violation of Section 2(d) of The Trademark Act, 15 U.S.C. §1052(d), when used on or in connection with Applicant's Goods.

21. Under the circumstances, registration of Applicant's Mark will injure House of Kuipers by causing the trade or purchasing public to be confused or deceived into believing that John Zox's Goods are those of House of Kuipers or are sponsored by House of Kuipers, and will place a cloud over House of Kuipers' title to its ZOX marks, in violation of Section 2(d) of the Trademark Act, 15 U.S.C. § 1052(d).

22. House of Kuipers' Trademarks were well established and famous before any priority date upon which John Zox can rely. The registration by John Zox of the ZOX mark in classes that are the same as or in close proximity to House of Kuipers' Goods would diminish and dilute the distinctive quality of House of Kuipers' rights in its famous ZOX marks in violation of 15 U.S.C. §1125(c). Moreover, the registration by John Zox would diminish the advertising value of House of Kuipers' Trademarks, and such registration would, in the event of any quality problems involving Applicant's Goods, tarnish the distinctiveness of House of Kuipers' Trademarks.

23. Applicant's Mark is likely to lessen the capacity of House of Kuipers' Trademarks to identify and distinguish House of Kuipers' Goods.

24. The Application should be refused because House of Kuipers' rights of continuing its present use of House of Kuipers' Trademarks in commerce are, or would be,

threatened by John Zox's registration of the ZOX mark for Applicant's Goods, and because House of Kuipers' business would be otherwise damaged by John Zox's registration of the ZOX mark for John Zox's Goods. The Application is also inconsistent with the prior established rights of House of Kuipers in its House of Kuipers' Trademarks and is now and will continue to be a source of damage and injury to House of Kuipers' Trademarks.

WHEREFORE, House of Kuipers prays that Application Serial No. 88/228,839 be rejected, and that registration for the mark sought for the goods in the Application be denied and refused.

The required fee for opposing one class of goods, and any additional fees, may be charged to House of Kuipers' representative's deposit account No. 03-2030

Respectfully submitted,
CISLO & THOMAS LLP

Dated: November ~~23~~⁴9, 20~~20~~¹⁹

/Katherine M. Bond/

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19-39901

EXHIBIT A

19-39901

JOHN ZOX SPECIMEN: CLASS 16

zox classic round sticker
★★★★★ 4.7 (4938)

\$4.95
per sheet of 20
Qty: 1 sheet of 20 [Add to Cart](#)
15% off with code COZYUPSALE17



Designed for you

[Customize](#)



Shape
Classic Round Sticker



[Details](#)



Size
Small, 1 1/2 inch (sheet of 20)

[More \(2\)](#)



Finish
Glossy

XYZ SPECIMEN: CLASS 16

xyz classic round sticker
★★★★★ 4.8 (14412)

\$5.95
per sheet of 20
Qty: 1 [Add to Cart](#)
20% off with code BESTZAZGIFTS



Share this: [Facebook](#) [Twitter](#) [Email](#)



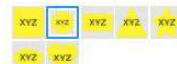
Create your own design
Designed by you

[Edit Design](#)

[Sell It](#)



Shape
Classic Round Sticker



[Details](#)



Size
Small, 1 1/2 inch (sheet of 20)

[More \(2\)](#)



Finish
Glossy



Get your order Nov 20 by 9pm with
[Shipping options](#)

JOHN ZOX SPECIMEN: CLASS 20

Custom 3/4" Tyvek® Wristbands

Production: 1 Business Day

Style shown: Neon Yellow



Edit Design



500 pack count

100 pack count



Neon Colors



Neon Blue



Neon Green



Neon Orange



Neon Pink



Neon Red



Neon Yellow



Price: 1-19 \$15.90
20+ \$13.90

In Stock

Shipping: Will ship by Thursday, Jan 12th

FREE SHIPPING on Orders over \$100! (Contiguous US orders only)

Packs of 500: 0
Packs of 100: 0
Tyvek Setup: \$45.00
Total Price: \$45.00

Add to cart

XYZ SPECIMEN: CLASS 20

Custom 3/4" Tyvek® Wristbands

Production: 1 Business Day

No Imprint Fees! 100 Wristband Minimum. 1 Day Production. Black imprint.

Style shown:



Edit Design



★★★★★ 78 reviews

Neon Colors



Neon Green



Neon Red



Neon Yellow



Neon Blue



Neon Orange



Neon Pink



Packs of	Price
100-199	\$0.29
200-299	\$0.22
300-399	\$0.17
400-499	\$0.15
500-999	\$0.13
1000-1499	\$0.08
1500-1999	\$0.06
2000-4999	\$0.05
5000-9999	\$0.04

JOHN ZOX SPECIMEN: CLASS 22

19-39901

ZOX Gift Bag
★★★★★ 4.9 (115)

\$10.65
per gift bag

Qty: 1 gift bag [Add to Cart](#)


15% off with code GOZYUPSALE17

Designed for you

[Customize](#)

Size
Medium [More \(4\) ▶](#)

Finish
Matte [More \(2\) ▶](#)



Front Angled

Share this: [Email](#) [Facebook](#) [Twitter](#) [LinkedIn](#) [Print](#)

[Zoom](#) [Heart](#) [List](#)

XYZ SPECIMEN: CLASS 22

XYZ Gift Bag
★★★★★ 4.9 (992)

\$9.50
per gift bag

Qty: 1 [Add to Cart](#)


20% off with code BESTZAZGIFTS

Create your own design
Designed by you

[Edit Design](#) [Sell It](#)

Size
Medium [More \(4\) ▶](#)

Finish
Matte [More \(2\) ▶](#)



Front Angled

Share this: [Email](#) [Facebook](#) [Twitter](#) [LinkedIn](#) [Print](#)

[Zoom](#)

Arrives by Nov 30 with Express
[Shipping options](#)

JOHN ZOX SPECIMEN: CLASS 22

19-39901

Your Shopping Cart

[Home](#) / Cart: 1 Item - \$ 15.99



**Personalized Double Braid
Nylon Dock Lines**
3/8" x 10-ft

Color: Gold
Custom Message: ZOXX
Font Style: Block

Quantity

—

1

+

Item Price	Line Price
\$ 15.99	\$ 15.99

UPDATE

REMOVE

Checkout

Special Instructions...

Subtotal: \$ 15.99

PROCEED TO CHECKOUT

Checkout with **PayPal**

XYZ SPECIMEN: CLASS 22

Your Shopping Cart

[Home](#) / Cart: 1 Item - \$ 18.49



**Personalized Double Braid
Nylon Dock Lines**
3/8" x 10-ft

Color: Royal
Custom Message: xyz
Font Style: Block

Quantity

—

1

+

Item Price	Line Price
\$ 18.49	\$ 18.49

UPDATE

REMOVE

Checkout

Special Instructions...

Subtotal: \$ 18.49

PROCEED TO CHECKOUT

shop**Pay**


PayPal

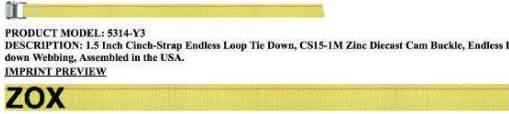
JOHN ZOXX SPECIMEN: CLASS 22

19-39901

CINCH STRAPS → 1.5 Inch Cinch Straps → 5314-Y3

Help

Total: \$0.00  Cart




PRODUCT MODEL: 5314-Y3
DESCRIPTION: 1.5 Inch Cinch-Strap Endless Loop Tie Down, CS15-1M Zinc Diecast Cam Buckle, Endless Loop (No Hooks), Total Strap Length 3 Ft (36 Inches), CW15-Y4PE Yellow Polyester Tie-down Webbing, Assembled in the USA.
IMPRINT PREVIEW

Prices:
Qty 1-9 = \$8.09 | Qty 10-49 = \$7.48 | Qty 50+ = \$6.93

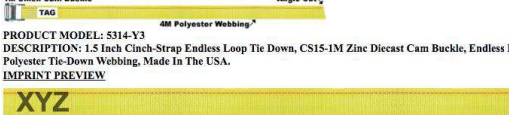
XYZ SPECIMEN: CLASS 22

Help

Total: \$0.00  Cart

1M Cinch Cam Buckle

Angle Cut



TAG

4M Polyester Webbing



PRODUCT MODEL: 5314-Y3
DESCRIPTION: 1.5 Inch Cinch-Strap Endless Loop Tie Down, CS15-1M Zinc Diecast Cam Buckle, Endless Loop (No Hooks), Total Strap Length 3 Ft (36 Inches), CW15-Y4PE 1.5 Inch 4M Yellow Polyester Tie-Down Webbing, Made In The USA.
IMPRINT PREVIEW

Prices:
Qty 1-9 = \$8.09 | Qty 10-49 = \$7.48 | Qty 50+ = \$6.93





JOHN ZOX SPECIMEN: CLASS 24

19-39901

Share







Fat Quarter




view larger


zox polyester fabric

\$40.50 per yard **★★★★★ 4.8** (139)

Artwork designed by
ZOX_BAND_OFFICIAL
[View their Store](#)

Fabric: [fabric guide](#) 


Polyester Poplin (60" width)

Size: [size chart](#) 

Yard

Quantity:
1 yard

[Customize it!](#) [Add to Cart](#)







 Custom made within 7 days. [When will I get it?](#)


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COZYUPSALE17 / Ends

XYZ SPECIMEN: CLASS 24



Share







Fat Quarter




view larger


xyz polyester fabric

\$40.55 per yard **★★★★★ 4.8** (139)
20% Off with code BESTZAZGIFTS

Artwork designed by
XYZ_BAND_OFFICIAL
[View their Store](#) [Ask this Designer](#)

Fabric: [fabric guide](#) 


Polyester Weave (58" width)

Size: [Size Chart](#) 

Yard

Quantity:
1 yard

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19-39901

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Swatch

zox linen fabric

\$72.10 per yard **★★★★★ 4.8** (39)

 Artwork designed by **ZOX_BAND_OFFICIAL**
View their Store

Fabric: [fabric guide](#)

Ivory Linen (54" width)

Size: [size chart](#)

Yard

Quantity: 1 yard

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XYZ SPECIMEN: CLASS 24

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

view larger



Fat Quarter

xyz linen fabric

\$66.05 per yard **★★★★★ 4.8** (122)
20% Off with code BESTZAZGIFTS

 Artwork designed by **XYZ_BAND_OFFICIAL**
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Fabric: [fabric guide](#)

Ivory Linen (54" width)


Size: [Size Chart](#)

Yard

Quantity: 1 yard

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JOHN ZOX SPECIMEN: CLASS 24

19-39901

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Close Up

view larger

zox cotton fabric

\$29.10 per yard ★★★★★ 4.8 (32)

Artwork designed by **ZOX_BAND_OFFICIAL**
View their Store

Fabric: [fabric guide](#) #
Combed Cotton (56" width)

Size: [size chart](#) ↗
Yard

Quantity:
1 yard

[Customize It!](#) [Add to Cart](#)

🚚 Custom made within 7 days. When will I get it?

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XYZ SPECIMEN: CLASS 24

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Close Up

view larger

xyz cotton fabric

\$26.65 per yard ★★★★★ 4.8 (32)
20% Off with code BESTZAZGIFTS

Artwork designed by **XYZ_BAND_OFFICIAL**
View their Store · Ask this Designer

Fabric: [fabric guide](#) #
Combed Cotton (56" width)

Size: [Size Chart](#) ↗
Yard

Quantity:
1 yard

[Customize It!](#) [Add to Cart](#)

🚚 Custom made within 9-14 days. When will I get it?

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JOHN ZOX SPECIMEN: CLASS 25 (deleted from Application)

19-39901

ZOX Stretch Pants

\$75.95

per pair of leggings

Qty: 1

Add to Cart

40% off with code BLKFRIDAYZAZ
ends today



Designed for you

Customize



Size

Size Chart

Select a size

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[Shipping options](#)

XYZ SPECIMEN: CLASS 25

XYZ Stretch Pants

★★★★★ 4.8 (809)

\$75.95

per pair of leggings

Qty: 1

Add to Cart

20% off with code BESTZAZGIFTS



Designed for you

by XYZ_BAND_OFFICIAL

Edit Design



Size

Size Chart

Select a size

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[Shipping options](#)

JOHN ZOX SPECIMEN: CLASS 25 (deleted from Application)


19-39901

ZOX Socks! Socks

\$26.07 each

Qty: 1 [Add to Cart](#)

20% off with code BLKFRIDAYZAZ ends today



Designed for you

[Customize](#)

Size: Small (US Men 5-7 / US Women 5-9)

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Estimated delivery Nov 29 to Nov 30 via Express. [Shipping options](#)

XYZ SPECIMEN: CLASS 25


YZZ Socks! Socks

★★★★★ 4.7 (139)

\$26.07 each

Qty: 1 [Add to Cart](#)

20% off with code BESTZAZGIFTS



Designed for you by XYZ_BAND_OFFICIAL

[Edit Design](#)

Size: Large (US Men 8-13 / US Women 9-13)

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[Shipping options](#)


JOHN ZOX SPECIMEN: CLASS 25 (deleted from Application)

19-39901

ZOX Jacket

\$67.80 per shirt Qty: 1 Add to Cart

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Front

Designed for you

Customize

Size Select a size Size Chart

Style American Apparel Fleece Zip Jogger See more

Color & Print Process White Learn more

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Estimated delivery Dec 4 via Express. Shipping options


XYZ SPECIMEN: CLASS 25

xyz Jacket

★★★★★ 5.0 (2)

\$42.55 per shirt Qty: 1 Add to Cart

20% off with code BESTZAGIFTS ends today



Design Front

There's an issue with this design. See details

Designed for you by Colfax_Country_Club Edit Design

Size Select a size

Style Women's Embroidered American Apparel Jacket More (17)

Color White Details

Design is previewed with RealView™ technology. Learn more

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Arrives by Dec 7 with Express Shipping options


JOHN ZOX SPECIMEN: CLASS 25 (deleted from Application)

19-39901

zox trucker hat

\$14.95 per hat Qty: 1 Add to Cart

15% off with code WEEKDAYSHOPZ



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Designed for you

Color White and Black


Estimated delivery Nov 19 to Nov 20 via Express. [Shipping options](#)

XYZ SPECIMEN: CLASS 25

XYZ Trucker Hat

★★★★★ 4.8 (2951) \$14.95 per hat Qty: 1 Add to Cart

20% off with code BESTZAZGIFTS



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Create your own design

Designed by you

Color White and Black

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JOHN ZOX SPECIMEN: CLASS 25 (deleted from Application)


19-39901

zox slip-on shoes

★★★★★ 4.6 (20)

Pair






\$90.90

per pair of slippers

Qty: 1 pair of slip... [Add to Cart](#)

15% off with code COZYUPSALE17

 Designed for you

[Customize](#)

Size

Select a size

Mirror

☐ Mirror


[Details](#)


XYZ SPECIMEN: CLASS 25

xyz slip-on shoes

★★★★★ 4.8 (71)

Pair






\$90.90

per pair of slippers

Qty: 1 [Add to Cart](#)

20% off with code BESTZAZGIFTS

 Designed for you

by XYZ_BAND_OFFICIAL

[Edit Design](#)

Size

Select a size

[Size Chart](#)

Mirror

☒ Mirror Left To Right

[Details](#)

JOHN ZOX SPECIMEN: CLASS 26

19-39901

Accessories > Athletic Headbands

Zox Headband Tie Headband

★★★★★ 5.0 (2)



Rotate 90°



Estimated delivery Feb 9 to Feb 13 via Express. [Shipping options](#)

\$16.95 each

Qty: 1 Headband [Add to Cart](#)

15% off with code COZYUPSALE17

Designed for you

[Customize](#)

Length 35" length [More \(2\)](#)

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Zoom icon

Heart icon

XYZ SPECIMEN: CLASS 26

XYZ Headband Tie Headband

★★★★★ 4.8 (23)



JOHN ZOX SPECIMEN: CLASS 26

19-39901

Accessories > Belt Buckles > Oval

zox belt buckle

★★★★★ 4.8 (28)

Estimated delivery Feb 7 via Express. [Shipping options](#)

\$39.10 per belt buckle

Qty: 1 belt buckle [Add to Cart](#)

15% off with code [COZYUPSALE17](#)

Designed for you

[Customize](#)

Style
Oval

[Details](#)



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XYZ SPECIMEN: CLASS 26

xyz belt buckle

★★★★★ 4.8 (64)

\$39.10 per belt buckle

Qty: 1 [Sold Out](#)

20% off with code [BESTZAZGIFTS](#)


Sorry, this Size is temporarily sold out. Please select another Style. We'll let you know when it's available!

Designed for you
by [XYZ_BAND_OFFICIAL](#)

[Edit Design](#)

Style
Oval

[Details](#)



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JOHN ZOX SPECIMEN: CLASS 26

19-39901

Zox Hair/Arm Band Tie Ribbon Hair Tie

★★★★☆ 4.5 (44)

\$2.55

per hair tie

Qty: 1

hair tie


Add to Cart

15% off with code COZYUPSALE17

Designed for you

Customize

Left



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Zoom icon

Heart icon

XYZ SPECIMEN: CLASS 26

Xyz Hair/Arm Band Tie Ribbon Hair Tie

★★★★☆ 4.5 (200)

\$2.55

per hair tie

Qty: 1

Add to Cart

20% off with code BESTZAGIFTS


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Designed by you

Edit Design

Sell It

Left



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Zoom icon

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JOHN ZOX SPECIMEN: CLASS 26


26

19-39901

Accessories > Jewelry > Charms

zox zipper pull charm

★★★★★ 4.7 (81)



Estimated delivery Feb 7 via Express. [Shipping options](#)

\$16.60 per item

Qty: 1 [Add to Cart](#)

15% off with code COZYUPSALE17

Designed for you

[Customize](#)

Style Charm

[Details](#)

Shape Square

[Details](#)

Color Silver Plated

[Details](#)

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XYZ SPECIMEN: CLASS 26

Accessories > Jewelry > Charms

xyz zipper pull charm

★★★★★ 4.8 (196)



Estimated delivery Feb 7 via Express. [Shipping options](#)

\$16.60 per item

Qty: 1 [Add to Cart](#)

20% off with code BESTZAGIFTS

Designed for you

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Style Charm

[Details](#)

Shape Square

[Details](#)

Color Silver Plated

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JOHN ZOX SPECIMEN: CLASS 26

19-39901

Accessories > Jewelry > Charms

zox zipper pull charm

★★★★★ 4.7 (91)

\$16.60

per item

Qty:

1 item

Add to Cart

15% off with code COZYUPSALE17

Front

Designed for you

Customize

Style Charm

Details

Shape Square

Details

Color Silver Plated

Details

XYZ SPECIMEN: CLASS 26

Accessories > Jewelry > Charms

xyz zipper pull charm

★★★★★ 4.8 (190)

\$16.60

per item

Qty: 1

Add to Cart

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Designed for you

Edit Design

Style Charm

Shape Square

Color Silver Plated

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JOHN ZOX SPECIMEN: CLASS 28

19-39901

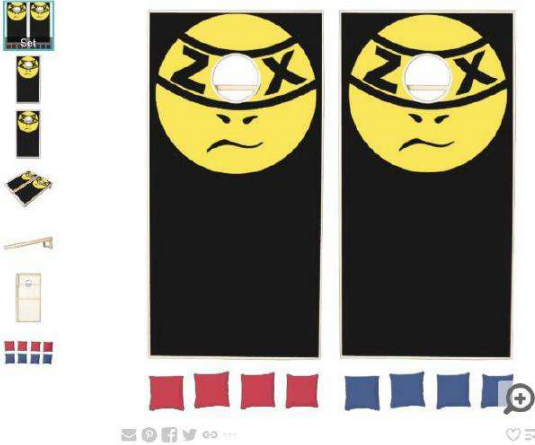
zox cornhole game cornhole set

★★★★★ 5.0 (4)

\$238.00 per set

Qty: 1 Cornhole ... [Add to Cart](#)

15% off with code GONEINZFLASH



Designed for you

[Customize](#)

Board Color: Natural Wood

Bag Colors: Board 1: Red

Bag Colors: Board 2: Royal Blue

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XYZ SPECIMEN: CLASS 28


xyz cornhole game cornhole set

★★★★★ 4.8 (17)

\$200.00 per set

Qty: 1 [Add to Cart](#)

20% off with code BESTZAZGIFTS



There are issues with this design. [See details](#)

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Board Color: Natural Wood

Bag Colors: Board 1: Red

Bag Colors: Board 2: Red

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Arrives by Dec 1 with Express [Shipping options](#)

JOHN ZOX SPECIMEN: CLASS 28

19-39901

Estimated delivery Feb 3 via express. [Shipping options](#)

zox basketball hoop game

★★★★★ 4.3 (5)


\$22.30
per mini basketball hoop

Qty: 1 mini bask... [Add to Cart](#)

15% off with code [GONEINZFLASH](#)

Designed for you

[Customize](#)



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XYZ SPECIMEN: CLASS 28

xyz basketball hoop game

★★★★★ 4.6 (35)


\$22.30
per mini basketball hoop

Qty: 1 [Add to Cart](#)

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by [XYZ_BAND_OFFICIAL](#)

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[Truck](#) Arrives by Nov 25 with Express [Shipping options](#)

JOHN ZOX SPECIMEN: CLASS 28

19-39901

zox jigsaw puzzle
★★★★★ 4.2 (82)

\$16.95
per puzzle


Qty: 1 puzzle [Add to Cart](#)

15% off with code GONEINZFLASH

Designed for you

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Size
8x10 Photo Puzzle with Gift Box [More \(2\)](#)



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XYZ SPECIMEN: CLASS 28

xyz jigsaw puzzle
★★★★★ 4.6 (337)

\$16.95
per puzzle

Qty: 1 [Add to Cart](#)

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Size

- ☐ 11" x 14", 30 oversized pieces - Easy +\$...
- ☐ 16" x 20", 56 pcs - Easy +\$33.00
- ☒ 8" x 10", 110 pieces - Challenging +\$2...
- ☐ 11" x 14", 252 pieces - Challenging +\$2...
- ☐ 16" x 20", 520 pcs - Hard +\$23.00
- ☐ 20" x 20", 676 pieces - Difficult +\$38.00
- ☐ 20" x 30", 1014 pieces - Difficult +\$43.00



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JOHN ZOX SPECIMEN

19-39901

zox metal ornament

★★★★★ 4.8 (446)

\$20.95 per ornament

Qty: 1 ornament [Add to Cart](#)

15% off with code GONEINZFLASH



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[Customize](#)

Style Premium Square Ornament

[Details](#)

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XYZ SPECIMEN


xyz metal ornament

★★★★★ 4.8 (390)

\$20.95 per ornament

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Qty: 1 [Add to Cart](#)



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Style Premium Square Ornament

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JOHN ZOX SPECIMEN

19-39901

zox ceramic ornament

★★★★★ 4.7 (809)

\$12.95 per ornament

Qty: 1 ornament [Add to Cart](#)

15% off with code GONEINZFLASH

Designed for you

[Customize](#)

Style

Oval Ornament

[Details](#)

Add A Gift Pouch

☐ Add A Gift Pouch

XYZ SPECIMEN

xyz ceramic ornament

★★★★★ 4.7 (1279)

\$12.95 per ornament

Qty: 1 [Add to Cart](#)

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Style

Oval Ornament

[Details](#)

Add A Gift Pouch

☐ Velvet Gift Pouch + \$1.95

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JOHN ZOX SPECIMEN

19-39901

zox metal ornament

★★★★★ 4.8 (154)

\$20.95
per ornament

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Style
Premium Round Ornament

[Details](#)

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XYZ SPECIMEN









xyz metal ornament

★★★★★ 4.8 (971)

\$20.95
per ornament

Qty: 1 [Add to Cart](#)

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Style
Premium Round Ornament

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Amended Notice of Opposition was served upon John Zox' attorney of record by electronic mail on November 20, 2020.

Counsel for Applicant:
DARREN GELIEBTER
ERIC HUANG
deliebter@lgtrademarklaw.com
ehuang@lgtrademark.com

Dated: November 23, 2020 /Katherine M. Bond/
Katherine M. Bond, Esq.

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~~I hereby certify that a copy of the foregoing Notice of Opposition was served upon John Zox and his attorney of record, by first class mail, postage prepaid, to the addresses listed on the date given below and by electronic mail to docket@bozpat.com.~~

~~John Zox
Church St. Sta. — PO Box 3236
New York, NY 100083236~~

~~Edward Baba
Bozicevic, Field & Francis LLP
201 Redwood Shores Parkway, Suite 200
Redwood City, CA 94065~~

~~Dated: November 19, 2019~~ ~~DRAFT~~
~~Daniel M. Cisto, Esq.~~
~~David B. Sandelands, Esq.~~

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

IN THE MATTER OF TRADEMARK SERIAL NO. 88/228,839

House of Kuipers LLC, a California limited)	
liability company, et al.,)	
)	
Opposer,)	
)	Opposition No.: 91252817
v.)	
)	
John Zox, an Individual,)	
)	
Applicant.)	
)	

AMENDED NOTICE OF OPPOSITION

Opposer House of Kuipers, LLC, a California Limited Liability Company, having offices at 5304 Derry Avenue, Suite G, Agoura Hills, CA 91301, and its related entity ZOX LLC, a California Limited Liability Company, having offices at 5304 Derry Avenue Suite J, Agoura Hills, CA 91301 (collectively, “House of Kuipers”), believes that it will be damaged by the registration of the trademark shown in Application Serial No. 88/228,839 (the “Application”) filed by ZOX Music and later assigned to John ZOX an individual with address at PO Box 3236 Church Street, New York, New York 100083236 (collectively, “John Zox”). House of Kuipers therefore opposes the Application and requests that registration of the Application be refused.

As grounds for its opposition, House of Kuipers alleges that:

1. John Zox seeks to register a mark that consists of the term ZOX (“Applicant’s Mark”) for use in connection with “Non-magnetically encoded gift cards; Stickers and transfers” (Applicant’s Class 16 Application), “non-metal identification bracelets” (Applicant’s Class 20

Application), “all-purpose straps comprised of synthetic materials; Sacks or bags for the transportation or storage of materials in bulk; String” (Applicant’s Class 22 Application), “fabrics for textile use” (Applicant’s Class 24 Application), and “Arm bands; Belt buckles; Charms for shoes; Clothing accessories, namely, charms for attachment to zipper pulls and buttons; Hair bands; Shoe laces” (Applicant’s Class 26 Application) in International Classes 16, 20, 22, 24, and 26 (collectively, the “Applicant’s Goods”) John ZOX filed the Application on December 13, 2018.

2. This Notice of Opposition is timely filed within the time permitted following publication of the application in the Official Gazette.

3. Applicant’s registration should be denied in connection with Applicant’s Goods because Applicant’s ZOX mark is primarily merely a surname. Furthermore, Applicant has not provided and cannot show substantial, exclusive and continuous use of the mark in commerce in connection with Applicant’s Goods for at least the five years immediately before the date of his application for registration.

4. The Applicant’s Application should be refused in connection with Applicant’s Goods because Applicant’s use of the term “ZOX” does not function as a trademark. As further described below, Applicant’s specimens filed in connection with the Application show merely ornamental use of the term “ZOX.” A purchaser of the goods would not understand that the term “ZOX” on the Applicant’s Goods is intended to identify the applicant as the source of the goods, but rather would see it only an ornamentation on the goods.

5. The Applicant’s Application should be refused because registration is being sought fraudulently in violation of 15 U.S.C. § 1064(3). As House of Kuipers’ has grown more famous, so have the claims of Applicant that it also now sells the same goods or goods in close

proximity to House of Kuipers Goods in interstate commerce. Since as early as 2014, Applicant has sought to register trademarks that infringe upon and dilute the House of Kuipers' Trademarks (See Serial No. 86954997) on the basis that because Applicant's last name is ZOX and Applicant's late musical band was called "ZOX," it should be entitled to the ZOX trademark across a wide variety of goods. Applicant's musical band, ZOX, has not toured since 2014, and Applicant's specimens do not show goods that have actually been produced, rather provide mockups of goods that Applicant may produce and sell. For example, a consumer can use the online custom print platform such as Zazzle to upload an image and/or name. Attached as **Exhibit A** are "replications" using "XYZ" in a circle design of some of the alleged specimens Applicant filed in connection with the Application. Upon information and belief, Applicant did not make a *bona fide* use of the applied-for ZOX mark in U.S. commerce in connection with the identified goods at the time the Application was filed. If true, the subject application is *void ab initio*, pursuant to 15 U.S.C. § 1051(a), and the application should be refused accordingly. House of Kuipers has reason to believe that Applicant has not sold any or most of the goods claimed by Applicant in interstate commerce at any point or at least not for five years prior to this Application. Applicant's Application contains the statements that "[t]he applicant...is using the mark in commerce," and that "the mark was first used at least as early as the dates listed in the table below and first used in commerce at least as early as the dates listed in the table below."

Class	Goods	First Use In Commerce
16	Non-magnetically encoded gift cards; Stickers and transfers.	20040901
20	Non-metal identification bracelets	20050601
22	All-purpose straps comprised of synthetic textile materials; Sacks or	20050601

	bags for the transportation or storage of materials in bulk; String.	
24	Fabrics for textile use	20070101
26	Arm bands; Belt buckles; Charms for shoes; Clothing accessories, namely, charms for attachment to zipper pulls and buttons; Hair bands; Shoe laces.	20050601
28	Party games	20070101

The Applicant also contains a standard declaration as to the truth of Applicant's statements in the Application.

6. Alternatively, Applicant's Application should be refused because registration is being sought for a mark that has been abandoned by Applicant. Any registration would be in violation of 15 U.S.C. § 1064(3).

7. Since at least as early as 1991, House of Kuipers, its predecessors, its assignors, its related companies, or its licensees have continuously used the term ZOX, alone or with another term for a wide variety of retail products and services, including ZOX, ZOXBOX, ZOX STRAPS, and ZOXLIST ("House of Kuipers' Trademarks") in connection with the sale of retail and wholesale products including wristbands, clasp bracelets, hoodies, hoodie strings, dog bags, backpacks, camera bags, small bags, interchangeable bag straps, shirts, wall prints, keychains, lanyards, coloring books, stickers, electronic gift cards and radio frequency identification bracelets, and in close proximity to clothing, accessories and identification bracelets, and paper products ("House of Kuipers' Goods"), the products being sold under the name ZOX and now appearing in connection with House of Kuipers' related trademarks and goods on the zox.la product pages.

8. Since at least as early as 1991, ZOX International, Inc., a Nebraska Corporation, continuously used the term ZOX, Registration No. 2,992,108 in interstate commerce as an identifier of a variety of goods and services, including clothing and accessories; namely, jackets, coats, sweaters, pants, shirts, shorts, swimwear, and undergarments for women and men, jogging suits, T-shirts, tank tops, jerseys, cotton woven shirts, knit shirts, polo shirts, golf shirts, dresses, blouses, nightgowns, pajamas, sweat pants, sweatshirts, jogging suits, neckties, belts, suspenders, sandals, shoes, caps, hats, wristbands, head bands, sun visors, scarves, bandannas, ear muffs, gloves, mittens, leg warmers, pantyhose, stockings, leotards, tights, and leggings in International Class 25. This trademark was registered on the Principal Register on September 6, 2005 from an application filed on May 10, 2004. House of Kuipers was assigned the rights and goodwill associated with Registration No. 2,992,108 on April 25, 2013.

9. Since at least as early as 2011, House of Kuipers, its predecessors, its related companies, or its licensees have continuously used the term ZOX Straps, Registration No. 4,412,948 in interstate commerce as an identifier of a variety of goods and services, including Elastic fabric wristbands in the nature of a bracelet in International Class 14. This trademark was registered on the Principal Register on October 8, 2013 from an application filed on October 3, 2011.

10. Since at least as early as 2011, House of Kuipers, its predecessors, its related companies, or its licensees have continuously used the term ZOX, Registration No. 4,465,691 in interstate commerce as an identifier of a variety of goods and services, including Wristbands in the nature of a bracelet in International Class 14 and Wristbands; shirts in International Class 025. This trademark was registered on the Principal Register on January 14, 2014 from an application filed on May 31, 2013.

11. Since at least as early as 2012, House of Kuipers, its predecessors, its related companies, or its licensees have continuously used the term ZOXBBOX, Registration No 4,759,961 in interstate commerce as an identifier of a variety of goods and services, including Wristbands in International Class 025. This trademark was registered on the Principal Register on June 23, 2015 from an application filed on November 2, 2014.

12. Since at least as early as 2011, House of Kuipers, its predecessors, its related companies, or its licensees have continuously used the term ZOX, Registration No 5,233,845 in interstate commerce as an identifier of a variety of goods and services, including Backpacks in International Class 018 and On-line retail and wholesale store services featuring clothing apparel, wristbands, bags and accessories in International Class 035. This trademark was registered on the Principal Register on June 27, 2017 from an application filed on July 7, 2016.

13. House of Kuipers' Trademarks have also continuously appeared in substantial advertising and promotion of House of Kuipers' Goods, such that the marks are closely identified with House of Kuipers' Goods and have gained valuable public recognition. House of Kuipers has substantial and continuous sales and advertising in all fifty United States for House of Kuipers Goods'. House of Kuipers' Trademarks are inherently distinctive or have become distinctive through acquisition of secondary meaning. By virtue of its sales of high-quality products bearing House of Kuipers' Trademarks in interstate commerce, its expenditures of considerable sums for promotional activities, and the excellence of its products, House of Kuipers developed significant goodwill in House of Kuipers' Trademarks and a valuable reputation.

14. House of Kuipers has continuously used House of Kuipers' Trademarks in interstate commerce for retail products and services related to House of Kuipers' Goods, and in

close proximity to products, including wristbands, clothing accessories, radio frequency identification bracelets, gift cards, stickers, and interchangeable strings for bags all of which directly overlap with Applicant's Goods since prior to any date upon which John Zox can rely.

15. Applicant's Class 20 Application for "non-metal identification bracelets," directly overlap or are in close proximity to House of Kuipers' Goods, including wristbands, bracelets, backpacks, clothing and accessories (Registration Nos. 2,992,108, 4,412,948, 4,465,691 and 5,233,845).

16. Applicant's Class 22 Application for "fabrics for textile use" directly overlaps with or are in close proximity to House of Kuipers' Goods, including wristbands, bracelets, backpacks, clothing and accessories (Registration Nos. 2,992,108, 4,412,948, 4,465,691 and 5,233,845).

17. Applicant's Class 24 "Arm bands; Belt buckles; Charms for shoes; Clothing accessories, namely, charms for attachment to zipper pulls and buttons; Hair bands; Shoe laces" directly overlap or are in close proximity to House of Kuipers' Goods, including wristbands, bracelets, backpacks, clothing and accessories (Registration Nos. 2,992,108, 4,412,948, 4,465,691 and 5,233,845).

18. Applicant's Class 26 Application for "all-purpose straps comprised of synthetic materials; Sacks or bags for the transportation or storage of materials in bulk; String" directly overlap or are in close proximity to House of Kuipers' Goods, including wristbands, bracelets, backpacks, clothing and accessories (Registration Nos. 2,992,108, 4,412,948, 4,465,691 and 5,233,845).

19. House of Kuipers' Trademarks are distinctive, strong, and famous such that the public would associate House of Kuipers' Trademarks with House of Kuipers when encountering House of Kuipers' Trademarks apart from House of Kuipers' Goods.

20. Applicant's Mark so resembles House of Kuipers' Trademarks, as to be likely to cause confusion, or cause mistake, or to deceive, in violation of Section 2(d) of The Trademark Act, 15 U.S.C. §1052(d), when used on or in connection with Applicant's Goods.

21. Under the circumstances, registration of Applicant's Mark will injure House of Kuipers by causing the trade or purchasing public to be confused or deceived into believing that John Zox's Goods are those of House of Kuipers or are sponsored by House of Kuipers, and will place a cloud over House of Kuipers' title to its ZOX marks, in violation of Section 2(d) of the Trademark Act, 15 U.S.C. § 1052(d).

22. House of Kuipers' Trademarks were well established and famous before any priority date upon which John Zox can rely. The registration by John Zox of the ZOX mark in classes that are the same as or in close proximity to House of Kuipers' Goods would diminish and dilute the distinctive quality of House of Kuipers' rights in its famous ZOX marks in violation of 15 U.S.C. §1125(c). Moreover, the registration by John Zox would diminish the advertising value of House of Kuipers' Trademarks, and such registration would, in the event of any quality problems involving Applicant's Goods, tarnish the distinctiveness of House of Kuipers' Trademarks.

23. Applicant's Mark is likely to lessen the capacity of House of Kuipers' Trademarks to identify and distinguish House of Kuipers' Goods.

24. The Application should be refused because House of Kuipers' rights of continuing its present use of House of Kuipers' Trademarks in commerce are, or would be,

threatened by John Zox's registration of the ZOX mark for Applicant's Goods, and because House of Kuipers' business would be otherwise damaged by John Zox's registration of the ZOX mark for John Zox's Goods. The Application is also inconsistent with the prior established rights of House of Kuipers in its House of Kuipers' Trademarks and is now and will continue to be a source of damage and injury to House of Kuipers' Trademarks.

WHEREFORE, House of Kuipers prays that Application Serial No. 88/228,839 be rejected, and that registration for the mark sought for the goods in the Application be denied and refused.

The required fee for opposing one class of goods, and any additional fees, may be charged to House of Kuipers' representative's deposit account No. 03-2030

Respectfully submitted,

CISLO & THOMAS LLP

Dated: November 23, 2020

/Katherine M. Bond/

Daniel M. Cislo, Esq.

Katherine M. Bond

David B. Sandelands, Esq.

CISLO & THOMAS LLP

12100 Wilshire Blvd., Suite 1700

Los Angeles, CA 90025

Tel: (310) 451-0647

Fax: (310) 394-4477

EXHIBIT A

JOHN ZOX SPECIMEN: CLASS 16

zox classic round sticker

★★★★★ 4.7 (4538)

\$4.95
per sheet of 20

Qty: 1 sheet of 20

Add to Cart

15% off with code COZYUPSALE17

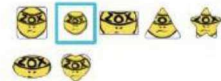


Designed for you

Customize



Shape
Classic Round Sticker



Details



Size
Small, 1½ inch (sheet of 20)

More (2)



Finish

Glossy

XYZ SPECIMEN: CLASS 16

xyz classic round sticker

★★★★★ 4.8 (14412)

\$5.95
per sheet of 20

Qty: 1

Add to Cart

20% off with code BESTZAGIFTS



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Shape
Classic Round Sticker



Details



Size
Small, 1½ inch (sheet of 20)

More (2)



Finish

Glossy



Get your order Nov 20 by 9pm with
Shipping options

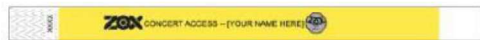
zip

JOHN ZOX SPECIMEN: CLASS 20

Custom 3/4" Tyvek® Wristbands

Production: 1 Business Day

Style shown: Neon Yellow



Edit Design

500 pack count

100 pack count

Neon Colors



Neon Blue

0



Neon Green

0



Neon Orange

0



Neon Pink

0



Neon Red

0



Neon Yellow

0



Price: 1-19 \$15.90
20+ \$13.90

In Stock

Shipping: Will ship by Thursday, Jan 12th

FREE SHIPPING on Orders over \$100! (Contiguous US orders only)

Packs of 500: 0
Packs of 100: 0
Tyvek Setup: \$45.00
Total Price: \$45.00

Add to cart

XYZ SPECIMEN: CLASS 20

Custom 3/4" Tyvek® Wristbands

Production: 1 Business Day

No Imprint Fees! 100 Wristband Minimum. 1 Day Production. Black imprint.

Style shown:



Edit Design

★★★★★ 78 reviews

Neon Colors:



Neon Green

0



Neon Red

0



Neon Yellow

100



Neon Blue

0



Neon Orange

0



Neon Pink

0



Packs of Price

100-199 \$0.29

200-299 \$0.22

300-399 \$0.17

400-499 \$0.15

500-999 \$0.13

1000-1499 \$0.08

1500-1999 \$0.06

2000-4999 \$0.05

5000-9999 \$0.04

JOHN ZOX SPECIMEN: CLASS 22

ZOX Gift Bag

★★★★★ 4.9 (113)



\$10.65
per gift bag

Qty: 1 gift bag

Add to Cart

15% off with code GOZYUPSALE17



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Customize



Size
Medium

More (4) ▶



Finish
Matte

More (2) ▶



XYZ SPECIMEN: CLASS 22

XYZ Gift Bag

★★★★★ 4.9 (592)



Share this:

\$9.50
per gift bag

Qty: 1

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Sell It



Size
Medium

More (4) ▶




Finish
Matte

More (2) ▶



Arrives by Nov 30 with Express
[Shipping options](#)

JOHN ZOX SPECIMEN: CLASS 22



Personalized Double Braid Nylon Dock Lines
3/8" x 10-ft

Color: Gold
Custom Message: ZOX
Font Style: Block

Quantity

—

1

+

Item Price	Line Price
\$ 15.99	\$ 15.99

UPDATE

REMOVE

Your Shopping Cart

[Home](#) / Cart: 1 item - \$ 15.99

Checkout

Special instructions...

Subtotal: \$ 15.99

PROCEED TO CHECKOUT

Checkout with **PayPal**

XYZ SPECIMEN: CLASS 22



Personalized Double Braid Nylon Dock Lines
3/8" x 10-ft

Color: Royal
Custom Message: xyz
Font Style: Block

Quantity

—

1

+

Item Price	Line Price
\$ 18.49	\$ 18.49

UPDATE

REMOVE

Your Shopping Cart

[Home](#) / Cart: 1 item - \$ 18.49

Checkout

Special instructions...

Subtotal: \$ 18.49

PROCEED TO CHECKOUT


shop**Pay**

PayPal

JOHN ZOX SPECIMEN: CLASS 22

[CINCH STRAPS](#) → [1.5 Inch Cinch Straps](#) → [5314-Y3](#)Help


Total: \$0.00 Cart



PRODUCT MODEL: 5314-Y3


DESCRIPTION: 1.5 Inch Cinch-Strap Endless Loop Tie Down, CS15-1M Zinc Diecast Cam Buckle, Endless Loop (No Hooks), Total Strap Length 3 Ft (36 Inches), CW15-Y4PE Yellow Polyester Tie-down Webbing, Assembled in the USA.

[IMPRINT PREVIEW](#)



Prices:
Qty 1-9 = **\$8.09** | Qty 10-49 = \$7.48 | Qty 50+ = \$6.93

XYZ SPECIMEN: CLASS 22



Total: \$0.00 Cart


1M Cinch Cam Buckle **Angle Cut**

TAG **4M Polyester Webbing**

PRODUCT MODEL: 5314-Y3

DESCRIPTION: 1.5 Inch Cinch-Strap Endless Loop Tie Down, CS15-1M Zinc Diecast Cam Buckle, Endless Loop (No Hooks), Total Strap Length 3 Ft (36 Inches), CW15-Y4PE 1.5 Inch 4M Yellow Polyester Tie-Down Webbing, Made In The USA.

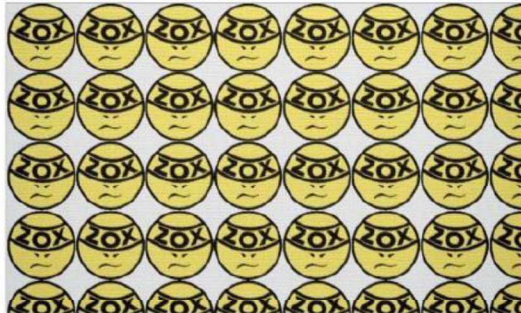
[IMPRINT PREVIEW](#)



Prices:
Qty 1-9 = **\$8.09** | Qty 10-49 = \$7.48 | Qty 50+ = \$6.93

JOHN ZOX SPECIMEN: CLASS 24

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view larger



zox polyester fabric

\$40.50 per yard ★★★★★ 4.8 (159)



Artwork designed by
ZOX_BAND_OFFICIAL
View their Store

Fabric: [fabric guide](#) #

Polyester Poplin (60" width)

Size: [size chart](#) ↗

Yard

Quantity:

1 yard

[Customize it!](#) [Add to Cart](#)

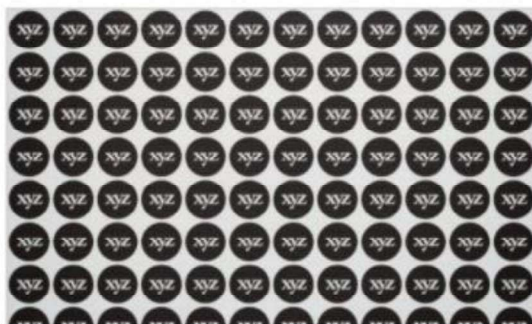
Custom made within 7 days. When will I get it?

[Like](#) [Add to](#)

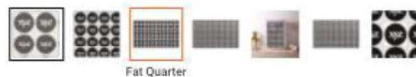
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15% Off Sitewide | Use Code:
COZYUPSALE17 / Ends

XYZ SPECIMEN: CLASS 24

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view larger



xyz polyester fabric

> \$40.55 per yard ★★★★★ 4.8 (1129)
20% Off with code **BESTAZGIFTS**

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View their Store [Ask this Designer](#)

Fabric: [fabric guide](#) #

Polyester Weave (58" width)

Size: [Size Chart](#) ↗

Yard

Quantity:

1 yard

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BESTAZGIFTS *details

JOHN ZOX SPECIMEN: CLASS 24

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view larger



zox linen fabric

\$72.10 per yard ★★★★★ 4.8 (129)



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Fabric: [fabric guide](#) #

Ivory Linen (54" width)

Size: [size chart](#) ↗

Yard

Quantity:

1 yard

Customize it!

Add to Cart



Custom made within 7 days. When will I get it?

Like

Add to

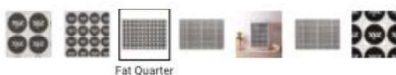
40% Off Mugs, Pillows & More |
15% Off Sitewide | Use Code:

XYZ SPECIMEN: CLASS 24

Share



view larger



xyz linen fabric

> \$66.05 per yard ★★★★★ 4.8 (129)

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XYZ_BAND_OFFICIAL

View their Store Ask this Designer

Fabric: [fabric guide](#) #

Ivory Linen (54" width)

Size: [Size Chart](#) ↗

Yard

Quantity:

1 yard

Customize it!

Add to Cart



Custom made within 9-14 days. When will I get it?

Like

Add to

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[Now >](#) Use Code:

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JOHN ZOX SPECIMEN: CLASS 24

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zox cotton fabric

\$29.10 per yard ★★★★★ 4.8 (152)



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[View their Store](#)

Fabric: [fabric guide](#)

Combed Cotton (56" width)

Size: [size chart](#)

Yard

Quantity:

1 yard

[Customize it!](#)

[Add to Cart](#)

Custom made within 7 days. [When will I get it?](#)

[Like](#)

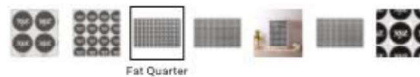
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15% Off Sitewide / Use Code:*

COZYUPSALE17 / Ends

XYZ SPECIMEN: CLASS 24

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xyz cotton fabric

> \$26.65 per yard ★★★★★ 4.8 (1173)

20% Off with code **BESTZAZGIFTS**

Artwork designed by
XYZ_BAND_OFFICIAL
[View their Store](#) [Ask this Designer](#)

Fabric: [fabric guide](#)

Combed Cotton (56" width)

Size: [Size Chart](#)

Yard

Quantity:

1 yard

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Custom made within 9-14 days. [When will I get it?](#)

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BESTZAZGIFTS *details

JOHN ZOX SPECIMEN: CLASS 25 (deleted from Application)

ZOX Stretch Pants

\$75.95

per pair of leggings

Qty: 1

Add to Cart

40% off with code BLKFRIDAYZAZ
ends today



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Customize



Size

[Size Chart](#)

Select a size



Estimated delivery Nov 30 to Dec 3 via Express.
[Shipping options](#)

XYZ SPECIMEN: CLASS 25

XYZ Stretch Pants

★★★★★ 4.8 (805)

\$75.95

per pair of leggings

Qty: 1

Add to Cart

20% off with code BESTZAZGIFTS



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Size

[Size Chart](#)

Select a size



Arrives by Nov 27 with Express
[Shipping options](#)

JOHN ZOX SPECIMEN: CLASS 25 (deleted from Application)

ZOX Socks! Socks

\$26.07
each

Qty: 1

Add to Cart

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ends today



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Size

Small (US Men 5-7 / US Women 5-9)



Estimated delivery Nov 29 to Nov 30 via Express.
[Shipping options](#)

XYZ SPECIMEN: CLASS 25

YZZ Socks! Socks

★★★★★ 4.7 (139)

\$26.07
each

Qty: 1

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20% off with code BESTZAZGIFTS



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by XYZ_BAND_OFFICIAL

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Size

Large (US Men 8-13 / US Wom...



Get your order Nov 23 by 9pm with

[Express](#)

[Shipping options](#)

JOHN ZOX SPECIMEN: CLASS 25 (deleted from Application)

ZOX Jacket

\$67.80

per shirt

Qty: 1

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ends today



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Estimated delivery Dec 4 via Express. [Shipping options](#)



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Customize



Size

[Size Chart](#)

Select a size



Style

American Apparel Fleece Zip Jogger



[See more](#)

Color & Print Process

White

[Learn more](#)

XYZ SPECIMEN: CLASS 25

xyz Jacket

★★★★★ 5.0 (2)

\$42.55

per shirt

Qty: 1

Add to Cart

20% off with code BESTZAZGIFTS
ends today



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Designed for you

by Colfax_Country_Club

Edit Design



Size

Select a size



Style

Women's Embroidered American Apparel Jacket



[More \(17\)](#)

Color

White



[Details](#)

Arrives by Dec 7 with Express
[Shipping options](#)

JOHN ZOX SPECIMEN: CLASS 25 (deleted from Application)

zox trucker hat

\$14.95
per hat

Qty: 1

Add to Cart

15% off with code WEEKDAYSHOPZ



Independent artist's content may not match model depicted. RealView™ technology illustrates fit and usage only.

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Designed for you

Customize



Color
White and Black



Estimated delivery Nov 19 to Nov 20 via Express.
[Shipping options](#)

XYZ SPECIMEN: CLASS 25

XYZ Trucker Hat

★★★★★ 4.8 (3351)

\$14.95
per hat

Qty: 1

Add to Cart

20% off with code BESTZAZGIFTS



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Sell It



Color
White and Black



Get your order Nov 23 by 9pm with
[Shipping options](#)

zip

JOHN ZOX SPECIMEN: CLASS 25 (deleted from Application)

zox slip-on shoes

★★★★★ 4.8 (20)

\$90.90
per pair of slippers

Qty: 1 pair of slip...

Add to Cart

15% off with code COZYUPSALE17



Designed for you

Customize



Size

Select a size



Mirror

☒ Mirror

Details

XYZ SPECIMEN: CLASS 25

xyz slip-on shoes

★★★★★ 4.8 (71)

\$90.90
per pair of slippers

Qty: 1

Add to Cart

20% off with code BESTZAGIFTS



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by XYZ_BAND_OFFICIAL

Edit Design



Size

Select a size

Size Chart



Mirror

☒ Mirror Left To Right

Details

JOHN ZOX SPECIMEN: CLASS 26

Accessories > Athletic Headbands

Zox Headband Tie Headband

★★★★★ 5.0 (2)



Estimated delivery Feb 9 to Feb 13 via Express. [Shipping options](#)

\$16.95
each

Qty:

1

Headband

Add to Cart

15% off with code COZYUPSALE17

Designed for you



Customize



Length

35" length

[More \(2\)](#)

XYZ SPECIMEN: CLASS 26

XYZ Headband Tie Headband

★★★★★ 4.8 (23)



Share this:



\$16.95
each

Qty:

1

Add to Cart

20% off with code BESTZAZGIFTS

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Sell It



Length

35" length

[More \(2\)](#)



Arrives by Dec 1 with Express
[Shipping options](#)

JOHN ZOX SPECIMEN: CLASS 26

[Accessories](#) > [Belt Buckles](#) > [Oval](#)

zox belt buckle

★★★★★ 4.8 (28)



Estimated delivery Feb 7 via Express. [Shipping options](#)

\$39.10
per belt buckle

Qty: 1 belt buckle ▾

Add to Cart

15% off with code COZYUPSALE17



Designed for you

Customize



Style
Oval



[Details](#)

XYZ SPECIMEN: CLASS 26

xyz belt buckle

★★★★★ 4.8 (64)



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Share this:



\$39.10
per belt buckle

Qty: 1 ▾

Sold Out

20% off with code BESTZAZGIFTS

Sorry, this **Size** is temporarily sold out. Please select another Style. We'll let you know when it's available!



Designed for you
by XYZ_BAND_OFFICIAL

Edit Design



Style
Oval



[Details](#)

JOHN ZOX SPECIMEN: CLASS 26

Zox Hair/Arm Band Tie Ribbon Hair Tie

★★★★★ 4.5 (44)

\$2.55
per hair tie

Qty: 1 hair tie

Add to Cart

15% off with code COZYUPSALE17

Designed for you

Customize



XYZ SPECIMEN: CLASS 26

XYZ Hair/Arm Band Tie Ribbon Hair Tie

★★★★★ 4.5 (200)

\$2.55
per hair tie

Qty: 1

Add to Cart

20% off with code BESTZAZGIFTS

Create your own design
Designed by you

Edit Design

Sell It



Share this:



Arrives by Nov 25 with Express
[Shipping options](#)

JOHN ZOX SPECIMEN: CLASS 26

[Accessories](#) > [Jewelry](#) > [Charms](#)

zox zipper pull charm

★★★★★ 4.7 (91)



Estimated delivery Feb 7 via Express. [Shipping options](#)

\$16.60
per item

Qty: 1 item

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15% off with code COZYUPSALE17



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Shape
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Color
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XYZ SPECIMEN: CLASS 26

[Accessories](#) > [Jewelry](#) > [Charms](#)

xyz zipper pull charm

★★★★★ 4.8 (190)



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Arrives by Nov 25 with Express
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JOHN ZOX SPECIMEN: CLASS 26

Accessories > Jewelry > Charms

zox zipper pull charm

★★★★★ 4.7 (91)



Estimated delivery Feb 7 via Express. [Shipping options](#)

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XYZ SPECIMEN: CLASS 26

Accessories > Jewelry > Charms

xyz zipper pull charm

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JOHN ZOX SPECIMEN: CLASS 28

zox cornhole game cornhole set

★★★★★ 5.0 (4)

\$238.00

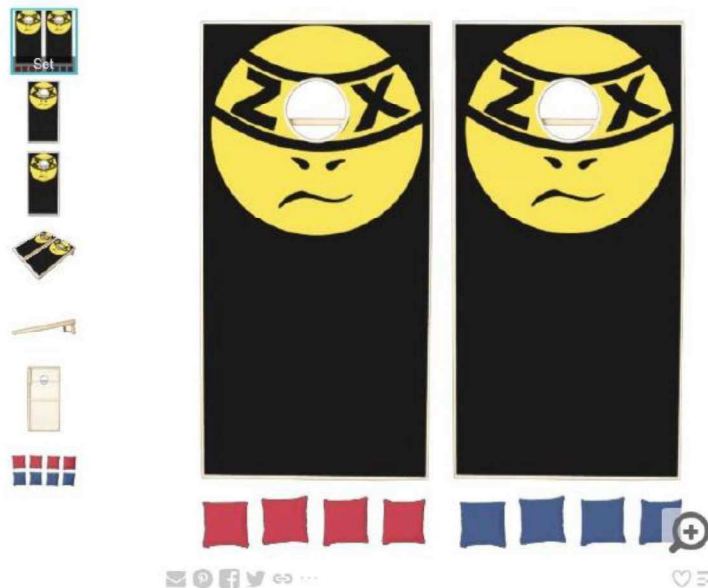
per set

Qty:

1 Cornhole ...

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Board Color
Natural Wood

Bag Colors: Board 1
Red

Bag Colors: Board 2
Royal Blue

XYZ SPECIMEN: CLASS 28

xyz cornhole game cornhole set

★★★★★ 4.8 (87)

\$200.00

per set

Qty:

1

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Board Color
Natural Wood

Bag Colors: Board 1
Red

Bag Colors: Board 2
Red

Arrives by Dec 1 with Express
[Shipping options](#)

JOHN ZOX SPECIMEN: CLASS 28

zox basketball hoop game

★★★★★ 4.3 (5)



Estimated delivery Feb 9 via Express. [Shipping options](#)

\$22.30
per mini basketball hoop

Qty: 1 mini bask...

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XYZ SPECIMEN: CLASS 28

xyz basketball hoop game

★★★★★ 4.6 (35)



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\$22.30
per mini basketball hoop

Qty: 1

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Arrives by Nov 25 with Express
[Shipping options](#)

JOHN ZOX SPECIMEN: CLASS 28

zox jigsaw puzzle

★★★★★ 4.2 (82)



\$16.95
per puzzle

Qty: 1 puzzle

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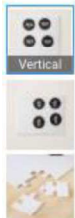


Size
8x10 Photo Puzzle with Gift Box [More \(2\)](#)

XYZ SPECIMEN: CLASS 28

xyz jigsaw puzzle

★★★★★ 4.6 (337)



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\$16.95
per puzzle

Qty: 1

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Size
☐ 11" x 14", 30 oversized pieces - Easy +\$...
☐ 16" x 20", 56 pcs - Easy +\$33.00
☒ 8" x 10", 110 pieces - Challenging
☐ 11" x 14", 252 pieces - Challenging +\$2...
☐ 16" x 20", 520 pcs - Hard +\$23.00
☐ 20" x 20", 676 pieces - Difficult +\$38.00
☐ 20" x 30", 1014 pieces - Difficult +\$43.00

Arrives by Nov 30 with Express
[Shipping options](#)

JOHN ZOX SPECIMEN

zox metal ornament

★★★★★ 4.8 (446)

\$20.95

per ornament

Qty: 1 ornament

Add to Cart

15% off with code GONEINZFLASH



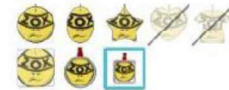
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Style

Premium Square Ornament



Details

XYZ SPECIMEN

xyz metal ornament

★★★★★ 4.8 (986)

\$20.95

per ornament

Qty: 1

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Style

Premium Square Ornament



Details



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JOHN ZOX SPECIMEN

zox ceramic ornament

★★★★★ 4.7 (809)



\$12.95
per ornament

Qty: 1

ornament

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Style
Oval Ornament



Details



Add A Gift Pouch

☐ Add A Gift Pouch



XYZ SPECIMEN

xyz ceramic ornament

★★★★★ 4.7 (1279)



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\$12.95
per ornament

Qty: 1

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Style
Oval Ornament



Details



Add A Gift Pouch

☐ Velvet Gift Pouch
+ \$1.95



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JOHN ZOX SPECIMEN

zox metal ornament

★★★★★ 4.8 (154)

\$20.95
per ornament

Qty: 1 ornament

Add to Cart

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Style
Premium Round Ornament



Details

XYZ SPECIMEN

xyz metal ornament

★★★★★ 4.8 (471)

\$20.95
per ornament

Qty: 1

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Style
Premium Round Ornament



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zip

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Amended Notice of Opposition was served upon John Zox' attorney of record by electronic mail on November 23, 2020.

Counsel for Applicant:
DARREN GELIEBTER
ERIC HUANG
deliebter@lgtrademarklaw.com
ehuang@lgtrademarklaw.com

Dated: November 23, 2020

/Katherine M. Bond/
Katherine M. Bond , Esq.